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## UNITED STATES DISTRICT COURT

MAY 17 2013

for the

Western District of Washington

AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
BY DEPUTY

In the Matter of the Search of

(Briefly describe the property to be searched  
or identify the person by name and address)

Mailbox number 590 at UPS Store #1277 located at  
10002 Aurora Ave N, Suite 36, Seattle, Washington  
98133, in the name of DANIEL MUNTEANU.

Case No.

MJ13-259 (1)

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

Mailbox number 590 at UPS Store #1277 located at 10002 Aurora Ave N, Suite 36, Seattle, Washington 98133, in the name of DANIEL MUNTEANU, as describe at Attachment A, incorporated herein.

located in the Western District of Washington, there is now concealed *(identify the person or describe the property to be seized)*:

See attached affidavit at Attachment B incorporated herein.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☐ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
Title 18 USC 1343	Wire Fraud
Title 18 USC 1543	Use of Altered Passport

The application is based on these facts:  
See attached affidavit

- ☒ Continued on the attached sheet.  
☒ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Lindsay Wills, SA HSI

Printed name and title

Sworn to before me and signed in my presence.

Date:

May 17, 2013



Judge's signature

City and state: Seattle, WA

Magistrate Judge Mary Alice Theiler

Printed name and title

# AFFIDAVIT

STATE OF WASHINGTON )  
 )  
 ) SS  
COUNTY OF KING )

I, Lindsay M. Wills, being duly sworn, do hereby depose and state as follows:

### XIII. INTRODUCTION

1. I am a Special Agent with U.S. Homeland Security Investigations (HSI), within Immigration and Customs Enforcement (ICE) in the Department of Homeland Security (DHS) in Seattle, Washington and have been so employed since 2007. I am currently assigned to a Financial Investigations Group, and in that capacity investigate criminal financial activity such as currency structuring, money laundering, wire fraud, and bulk cash smuggling. I am a member of the Financial Intelligence Review Team in Seattle, Washington, through which HSI and other federal law enforcement agencies share information and coordinate investigations into criminal activity in the banking industry. I also participate in Operation Cornerstone, a cooperative venture between HSI and the banking and financial industry, which addresses vulnerabilities in those industries that might be exploited by criminals.

2. I am a graduate of the Criminal Investigator Training Program and the ICE Special Agent Training Program at the Federal Law Enforcement Training Center. I have received training in interviewing techniques, arrest procedures, search warrant applications, the execution of searches and seizures, and various other criminal laws and procedures. I have attended training courses sponsored by ICE, the Department of Justice, the Department of Defense, and other law enforcement agencies, which focused on the investigation of money laundering violations and other financial crimes.

## II. PURPOSE OF AFFIDAVIT

3. This affidavit is being submitted in support of an application for a search warrant for violations of Title 18 United States Code Section 1343 (Wire Fraud) and

Section 1543 (Use of Altered Passport) to search the following places, (hereinafter "Target Mailboxes"):

a. Mailbox number 590 at UPS Store #1277 located at 10002 Aurora Ave N, Suite 36, Seattle, Washington 98133, in the name of DANIEL MUNTEANU.

b. Mailbox number 176 at Mailbox N Beyond, located at 14419 Greenwood Ave N, Suite A, Seattle, Washington, 98133, in the name of MARTIN DORSETT.

c. Mailbox number 155 at a UPS store #1476, located at 23632 Highway 99, Suite F, Edmonds, Washington, 98026, in the name of DAVID HEINY.

4. The information set forth in this affidavit consists of information I gathered and observed firsthand through the course of this investigation to date, as well as information relayed to me by other law enforcement personnel, information from victim statements, interviews of witnesses, and by review and analysis of various financial records. The information in this affidavit is not intended to detail each and every fact and circumstance of the investigation or all information known to me or all the participants involved in the investigation. Rather, I have set forth only the facts that I believe are necessary to establish probable cause that evidence, fruits and instrumentalities of violations of Title 18, United States Code, Section 1343, 1349 and 1543 will be found in the Target Mailboxes.

### III. RELEVANT LAW

5. Title 18, United States Code, Section 1343, specifies in relevant part that, whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice, shall be fined under this title or imprisoned not more than 20 years, or both. If the violation affects a financial institution, such person shall be fined not more than \$1,000,000 or imprisoned not more than 30 years, or both.

6. Title 18, United States Code, Section 1543, states that whoever willfully and knowingly uses, or attempts to use, or furnishes to another for use any such false, forges, counterfeited, mutilated, or altered passport or instrument purporting to be a passport, or any passport validly issued which has become void by the occurrence of any condition therein prescribed invalidating the same shall be fined under this title, imprisoned not more than 25 years (if the offense was committed to facilitate an act of international terrorism), 20 years (if the offense was committed to facilitate a drug trafficking crime), 10 years (in the case of the first or second such offense, if the offense was not committed to facilitate such an act of international terrorism or a drug trafficking crime), or 15 years (in the case of any other offense), or both.

#### **IV. SUMMARY OF INVESTIGATION**

7. On April 18, 2013, I received information that DANIEL MUNTEANU a.k.a. MARTIN DORSETT a.k.a. DAVID HEINY was participating in an online auto/boat auction fraud scheme by opening up mailboxes and bank accounts under fraudulent names using altered and counterfeit passports and then wiring the proceeds from the scheme outside of the country.

#### **V. THE INVESTIGATION**

##### **A. Use of Forged Passports to Open Mail Boxes and Bank Accounts**

8. On April 1, 2013, DANIEL MUNTEANU opened a mailbox at UPS Store #1277 located at 10002 Aurora Ave N, Suite 36, Apt./Mailbox 590, Seattle, Washington 98133 in his own name. DANIEL MUNTEANU used the United States Visa control number #xxxxxxxxx0001 in his Romanian Passport number #xxxxx834 and his Romanian identification card number #xxxxxxxxx0080 as proof of identity to open the mailbox.

9. On April 3, 2013, a parcel identified by UPS waybill 3A0477MFSB9 was addressed to DANIEL MUNTEANU at 10002 Aurora Ave N, Suite 36, Apt./Mailbox 590, Seattle, Washington 98133 from sender F.I.C. of Romania. The contents of the parcel stated to be a "society game;" however, the contents of the package are unknown.

10. On April 5, 2013, DANIEL MUNTEANU opened a second mailbox, mailbox 176, at Mailbox N Beyond, located at 14419 Greenwood Ave N, Suite A, Seattle, Washington, 98133, in the name of MARTIN DORSETT. The mailbox was opened using Finnish passport #xxxxxx506 and Finnish Identification #xxxxxxxx932, both of which were in the name of MARTIN DORSETT. I compared the photo on the Finnish passport and the photo on the Finnish identification card in the name of DORSETT to the photo on DANIEL MUNTEANU's United States Visa, number #xxxxxxxxxx0001, in his Romanian Passport number #xxxxxx834, and to photos listed in HSI port of entry databases for DANIEL MUNTEANU, and determined that MARTIN DORSETT and DANIEL MUNTEANU are the same person. The home address listed for MARTIN DORSETT on the Mailbox N Beyond application was 9501 Aurora Ave N, Seattle, Washington 98103, which is the address for the Crown Inn motel. When I interviewed DANIEL MONTEANU on April 30, 2013, he admitted that he had stayed at the Crown Inn during his trip to Seattle and I found a business card for the Crown Inn in his carry-on luggage.

11. On April 5, 2013, DANIEL MUNTEANU a.k.a. DORSETT MARTIN opened a Bank of America account xxxxxx0053 at the Aurora North branch located at 15401 Westminster Way N. Shoreline, Washington 98133. According to Bank of America records, the person opening account xxxxxx0053 in the name of DORSETT MARTIN furnished as proof of identity a Finnish passport #xxxxxx506 and Finnish Identification #xxxxxxxx932, both of which were in the name of MARTIN DORSETT. These are the same documents that were used to open the Greenwood Avenue North mailbox on April 5, 2013. Based on my review of the photograph of DANIEL MUNTEANU's United States Visa in his Romanian Passport, and my interview of DANIEL MUNTEANU on April 30, 2013, I determined that surveillance images obtained from Bank of America for the April 5, 2013 transaction show that the person who opened account xxxxxx0053 was actually DANIEL MUNTEANU.

12. On April 9, 2013, a parcel identified by UPS waybill 3A0477M3JJQ was addressed to MARTIN DORSETT at the Mailbox N Beyond mailbox at Greenwood

Avenue North, from individual F.I.C. in Romania. The contents of the parcel stated to be a "society game;" however, the contents of the package are unknown.

13. On April 15, 2013, DANIEL MUNTEANU opened a third mail box, mail box no. 155, located at a UPS store at 23632 Highway 99, Suite F, Edmonds, Washington 98026, which is UPS Store #1476, in the name of DAVID HEINY. I obtained a copy of the application for the mailbox, including the copy of the Czech Republic passport #xxxxx262 in the name of DAVID HEINY that was provided as proof of identity. I reviewed the photograph on Czech Republic passport #xxxxx262 and concluded the person depicted in the Czech Republic passport #xxxxx262 was actually DANIEL MUNTEANU.

14. On April 15, 2013, DANIEL MUNTEANU a.k.a. DAVID HEINY opened Bank of America account xxxxxx5611 at the Shoreline Banking Center located at 18525 Firlands Way N, Shoreline, Washington 98133. According to Bank of America records, the person opening account xxxxxx5611 furnished as proof of identity a Czech Republic passport number xxxxx262 in the name of DAVID HEINY. However, based on my review of the photograph of DANIEL MUNTEANU's United States Visa in his Romanian Passport, and my interview of DANIEL MUNTEANU on April 30, 2013, I determined that surveillance images obtained from Bank of America for the April 15, 2013 transaction show that the person who opened account xxxxxx5611 was actually DANIEL MUNTEANU. Furthermore, the account address listed on the Bank of America account xxxxxx5611 was UPS store at 23632 Highway 99, Suite F, Edmonds, Washington 98026, described above, opened by DANIEL MUNETANU on the same day, April 15, 2013, using the same Czech Republic passport.

**B. Execution of the Wire Fraud Scheme**

15. On April 6, 2013, a bank account was opened at the Wells Fargo Highlands Branch at 14500 Greenwood Ave N, Shoreline, WA 98133, in the name of MARTIN DORSETT using a Finnish passport number xxxxx506 and the address 14419 Greenwood Avenue, Suite A, Seattle, Washington 98133. This address is the address of the Mailbox N Beyond mailbox opened in the name of MARTIN DORSETT by



DANIEL MONTEANU on April 5, 2013. On April 11, 2013, a wire for \$23,500 was sent by J.W. from J.W.'s Bank of America account and credited to the Wells Fargo account in the name of MARTIN DORSETT. J.W. sought to have the wire recalled, but the transaction had been completed. The Wells Fargo account was closed by Wells Fargo.

16. On or about May 2, 2013, Wells Fargo mailed a cashier's check for \$23,515.06 to the Mailbox N Beyond mailbox, located at 14419 Greenwood Ave N, Suite A, Seattle, Washington, 98133, which was the address on the Wells Fargo account for MARTIN DORSETT. On May 16, 2013, a Mailbox N Beyond representative stated to me that there was a large amount of mail in the mailbox that had not been collected.

17. On April 19, 2013, W.G. sent \$35,000 via wire to the Bank of America account in the name of DAVID HEINY, account xxxxxx5611, to pay for a fishing boat that had been advertised in the fraudulent online action scheme. When W.G. sent a surveyor to inspect the boat on April 20, 2013, the surveyor told W.G. that the address of the boat's location was actually a florist shop and no boat was in sight. W.G. contacted Key Bank on April 20, 2013 to stop the transaction. However, the wire transaction had already been completed transferring the money from W.G.'s Key Bank account to the Bank of America account xxxxxx5611.

18. I have reviewed Bank of America records that demonstrate that on April 22, 2013, the bank account xxxxxx5611 was accessed through Bank of America online services using a computer, and instructions were placed causing a wire transmission for \$29,850.00 to individual F.I.C. in Romania. F.I.C. is the same individual who had sent two parcels to DANIEL MUNTEANU. W.G. has not received the boat that he paid for.

19. On April 22, 2013, Bank of America surveillance images show DANIEL MUNTEANU withdrawing \$100 in cash from the DAVID HEINY account xxxxxx5611 at the Bank of America ATM in Shoreline, Washington.

20. The investigation has revealed at least three further victims who wired a total of \$63,500 to accounts in the name of or associated with MARTIN DORSETT related to fraudulent internet auction site transactions.

21. For example, on April 11, 2013, the Bank of America account opened by DANIEL MUNTEANU on April 5, 2013 at the Aurora North branch located at 15401 Westminster Way N. Shoreline, in the name of DORSETT MARTIN was credited through a wire transaction with \$18,500 by victim M.M., who was attempting to purchase a tractor trailer via an online auction. The next day, April 12, 2013, bank surveillance video depicts DANIEL MUNTEANU withdrawing \$8,500.00 in cash from the account, and withdrawing a further \$8,000.00 in cash from the account on April 15, 2013.

22. It is difficult to identify any further victims of the scheme because DANIEL MUNTEANU used false passports in different names and opened bank accounts in those names. Based on my training and experience, the mules in online auto/boat fraud schemes open multiple accounts in different names to evade detection from law enforcement. Furthermore, many accounts are opened so that if one account is closed down by the bank, another account is available to receive funds from victims.

**C. Interview and Arrest of DANIEL MUNTEANU**

23. On April 30, 2013, at approximately 1:15 pm, Special Agent (SA) Justin Sebens and I approached DANIEL MUNTEANU in the jet way of Delta Airlines flight 232 to Amsterdam. DANIEL MUNTEANU had purchased a ticket in cash for \$996.90 on April 26, 2013 for a departure date of April 29, 2013 on Delta Airlines flight 232; however, DANIEL MUNTEANU failed to board the flight and was rescheduled for the April 30, 2013 departure. DANIEL MUNTEANU was escorted to the Customs and Border Protection inspection area.

24. Prior to the start of the interview, SA Justin Sebens and I conducted a search of DANIEL MUNTEANU's baggage pursuant to border search authority, which produced (1) a business card for the Crown Inn, located at 9501 Aurora Ave N, Seattle, (the home address listed for MARTIN DORSETT at Mailbox N Beyond), (2) an address book with the name of F.I.C. written on the inside cover, (3) a GPS unit DANIEL MUNTEANU stated he brought with him from Romania, (4) the Romanian cellular telephone, and (5) the Acer laptop computer. SA Sebens examined the GPS unit, which showed recent locations in the Western District of Washington for Wells Fargo Bank, US



Bank, Bank of America, Chase Bank, "Feds" Employees Credit Union, and GBC International Bank.

25. I read DANIEL MUNTEANU his Miranda rights, which he waived as witnessed by SA Justin Sebens. During the interview, DANIEL MUNTEANU stated that he came to the United States for a vacation and was supposed to meet up with his friend "Victor," who ended up not coming to Seattle. DANIEL MUNTEANU stated that while in the United States he did not conduct any business activities, he did not visit any banks, he did not open any mailboxes, and he did not receive any packages or letters. I showed DANIEL MUNTEANU a copy of the Mailbox N Beyond application which was completed in the name of MARTIN DORSETT on April 5, 2013, using the Finnish passport. DANIEL MUNTEANU admitted that he was depicted in the photograph in the Finnish Identification card and Finnish passport in the name of MARTIN DORSETT but stated that he had no idea how his photo got on those identification documents nor did he open the mailbox at Mailbox N Beyond in the name of MARTIN DORSETT. DANIEL MUNTEANU agreed it was ironic that the home address listed for MARTIN DORSETT was the same as the Crown Inn where he had stayed during his visit to Seattle.

26. I asked DANIEL MUNTEANU about the blue address book found in his carry-on luggage that had the name of F.I.C., the same name of the individual who had sent him two packages to the mailboxes he had opened under his own name and that of MARTIN DORSETT, and to whom the funds had been wired in Romania. DANIEL MUNTEANU stated that the address book did not belong to him, he did not know how it got in his carry-on bag even though he was the only person to have packed his bag, and he did not know who the address book belonged to.

27. Because the investigation had not yet identified W.G. as a victim nor other victims with actual loss at that time, DANIEL MUNTEANU was not arrested.

28. In the morning of May 1, 2013, I learned of online auction fraud involving victim W.G. described above, and that the account used to defraud W.G. was opened by DANIEL MUNTEANU. I arrested DANIEL MUNTEANU as he attempted to board Delta Airlines flight 232 to Amsterdam at the Seattle Tacoma International Airport.

DANIEL MUNTEANU was escorted to the Customs and Border Protection inspection area to be searched pursuant to border search authority before he was transported to the Federal Detention Center. I reexamined the GPS unit that was previously searched on April 30, 2013 and determined that the recent locations SA Justin Sebens and I saw listed on April 30, 2013 in the Western District of Washington for Wells Fargo Bank, US Bank, Bank of America, Chase Bank, "Feds" Employees Credit Union, and GBC International Bank had been erased.

#### **VI. MUNTEANU'S USE OF THE TARGET MAIL BOXES**

29. On April 1, 2013, DANIEL MUNTEANU opened the mailbox at UPS Store #1277 located at 10002 Aurora Ave N, Suite 36, Apt./Mailbox 590, Seattle, Washington 98133, in his own name. This mailbox was used to receive two UPS packages from F.I.C. in Romania, on April 3, and April 9, 2013. F.I.C. was the wire recipient of the proceeds of the wire fraud scheme.

30. On April 5, 2013, DANIEL MUNTEANU opened a second mailbox at Mailbox N Beyond, located at 14419 Greenwood Ave N, Suite A, Seattle, Washington, 98133, using a forged Finnish passport in the name of MARTIN DORSETT but bearing MUNTEANU's photograph.

31. On April 6, 2013, an account was opened at the Wells Fargo Highlands Branch at 14500 Greenwood Ave N, Shoreline, WA 98133, in the name of MARTIN DORSETT using a Finnish passport number xxxxx506 and the address of the Mailbox N. Beyond located at 14419 Greenwood Avenue, Suite A, Seattle, Washington 98133. On April 11, 2013, a wire for \$23,500 was sent by victim J.W. from J.W.'s Bank of America account and credited to the Wells Fargo account in the name of MARTIN DORSETT. On or about May 2, 2013, Wells Fargo sent a cashier's check for \$23,516.06 to the Mailbox N Beyond mailbox located at 14419 Greenwood Avenue, Suite A. in the name of MARTIN DORSETT. A representative of Mailbox N Beyond confirmed on May 16, 2013, that a large amount of mail had been placed in the mailbox and had not been collected.

32. On April 15, 2013, DANIEL MUNTEANU opened a third mail box located at a UPS store #1476 located at 23632 Highway 99, Suite F, Edmonds, Washington 98026, in the name of DAVID HEINY. The same day, DANIEL MUNTEANU opened Bank of America account xxxxxx5611 at the Shoreline Banking Center located at 18525 Firlands Way N, Shoreline, Washington 98133, and provided as his address the UPS mailbox located at 23632 Highway 99, Suite F, Edmonds, Washington 98026, which he had opened that day.

33. I have spoken with Timothy Whitesitt, Principal Investigator for Bank of America, who stated that bank records, such as monthly account statements, are regularly sent to the address given for the bank account.

34. Based on the investigation set forth above, I respectfully submit that there is probable cause to believe Target Mailboxes contain mail relating to fraudulent bank accounts opened by DANIEL MUNTEANU in furtherance of the wire fraud scheme. Search of the Target Mailboxes may reveal (1) further mail from F.I.C. in Romania, who is the recipient of the proceeds of the wire fraud scheme; (2) evidence of the known bank accounts, as well as (3) evidence of further bank accounts and victims that have not yet been identified. I also submit that there is probable cause to believe that the Mailbox N Beyond mailbox located at 14419 Greenwood Avenue, Suite A, Seattle, Washington 98133 contains a cashier's check for \$23,515.06 which are proceeds of the fraudulent scheme.

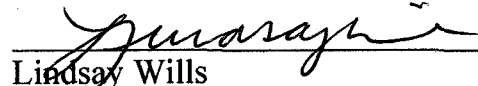
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## VII. CONCLUSION

35. Based on the facts outlined above, and my investigation to date, I respectfully submit that there is probable cause to believe that the Target Mailboxes contain evidence, fruits, and instrumentalities of criminal activity of violations of Title 18 USC 1343 (Wire Fraud) and Title 18 USC 1543 (Use of Altered Passport).

  
Lindsay Wills  
Special Agent  
Homeland Security Investigations

SUBSCRIBED and SWORN to before me this 17 day of May, 2013

  
MARY ALICE THEILER  
United States Magistrate Judge

**ATTACHMENT A  
PLACES TO BE SEARCHED**

- a. Mailbox number 590 at UPS Store #1277 located at 10002 Aurora Ave N, Suite 36, Seattle, Washington 98133, in the name of DANIEL MUNTEANU.
- b. Mailbox number 176 at Mailbox N Beyond, located at 14419 Greenwood Ave N, Suite A, Seattle, Washington, 98133, in the name of MARTIN DORSETT.
- c. Mailbox number 155 at a UPS store #1476, located at 23632 Highway 99, Suite F, Edmonds, Washington 98026, in the name of DAVID HEINY.

## **ATTACHMENT B**

### **Items to be Seized**

From:

- Mailbox number 590 at UPS Store #1277 located at 10002 Aurora Ave N, Suite 36, Seattle, Washington 98133, in the name of DANIEL MUNTEANU.
- Mailbox number 176 at Mailbox N Beyond, located at 14419 Greenwood Ave N, Suite A, Seattle, Washington, 98133, in the name of MARTIN DORSETT.
- Mailbox number 155 at a UPS store #1476, located at 23632 Highway 99, Suite F, Edmonds, Washington 98026, in the name of DAVID HEINY.

Any evidence of materials, instrumentalities, or fruits of violations of 18 U.S.C. § 1343, 1349 (Wire Fraud); 18 U.S.C. § 1543 (Use of Altered Passport) including but not limited to:

1. All bank and financial mail and records, including bank account statements, wire transfer slips/orders, cancelled checks, deposit and withdrawal records, money orders, money order receipts;
2. Any cashier's checks, and/or cashier's check receipts.
3. Any and all mail reflecting communications between or among DANIEL MUNTEANU and individuals in the United States and elsewhere related to violations of 18 U.S.C. § 1343, 1349 (Wire Fraud); 18 U.S.C. § 1543 (Use of Altered Passport).
4. Any and all mail reflecting communications between DANIEL MUNTEANU or others and individuals attempting to purchase goods through online auction sites.